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BY E-MAIL AND FIRST CLASS MAIL

Mary Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, Mass. 02110

RE: Bay State Gas, DTE 05-27

Dear Ms. Cottrell:

Please accept this letter as the United Steelworkers of America's statement in response to the Company's Motion for the Protective Treatment of its response to AG RR-9.

The United Steelworkers of America represents that it does not object to protective treatment of its response to AG RR-9, the Agreement for Business Process and Support Services between NiSource Corporate Services and IBM ("Agreement"), so long as all intervenors have the same access to the Agreement as the parties.

As grounds for its position, the Steelworkers state the following:

1. The Agreement between NiSource Corporate Services ("NSCS") and IBM is of fundamental importance to the outcome of this matter, as the Agreement will clearly impact the Company's costs and its ability to meet Service Quality Indicators during the rate year.
2. The import of the Agreement to this case is further demonstrated by the fact that both the Department of Telecommunications and Energy and the Attorney

general, as well as the Steelworkers and the Utility Workers Union of America, Local 273, both intervenors in this matter, have requested the Agreement. As yet, these requests have gone unfulfilled.

3. Although the Steelworkers recognize the Company's legitimate interest in limiting broad disclosure of the Agreement, the public's interest in service quality and the cost to ratepayers is not served by a restricting access to the Agreement to the parties. For example, the Agreement is central the Steelworker's discovery and briefing regarding the Company's service quality during the rate year. The Steelworkers, as the exclusive representative of all Call Center employees, is in a unique position to provide an analysis of the Company's service quality under the Agreement during the rate year.

For these reasons stated above, the Steelworkers submit that it does not oppose the Company's Motion, so long as all intervenors are granted the same access to the Agreement that the parties are granted.

Sincerely,

/s/ Nicole Horberg Decter

Nicole Horberg Decter

NHD:cf

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